

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

Plaintiff,

v.

Case No. 19-CR-227-1-JLS

JOSEPH BONGIOVANNI,

Defendant.

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**NOTICE OF MOTION**

<b>Moving Party:</b>	Defendant Joseph Bongiovanni
<b>Date and Time:</b>	TBD
<b>Place:</b>	Hon. Lawrence J. Vilaro U.S. Courthouse 2 Niagara Square Buffalo, New York 14202
<b>Supporting Papers:</b>	Declaration of Robert C. Singer, Esq., executed August 7, 2024
<b>Answering Papers:</b>	Due upon order of the court.
<b>Relief Requested:</b>	An Order granting defendant's motion to for joinder in ECF 1083.

Dated: August 7, 2024  
Williamsville, New York

**SINGER LEGAL PLLC**

*Attorneys for Defendant Joseph Bongiovanni*

By: /s/ Robert C. Singer, Esq.  
Robert C. Singer, Esq.  
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**TO: United States Attorney's Office**  
**for the Western District of New York**  
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**ATTORNEY DECLARATION**

I, ROBERT C. SINGER, ESQ., make this Declaration under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am an attorney at law duly licensed to practice in the State of New York and this Court and I am Owner of Singer Legal PLLC. Together with Parker Mackay, Esq., we act as attorneys for defendant Joseph Bongiovanni.

2. I have worked on this matter extensively; therefore, I am fully familiar with the facts set forth herein. I submit this declaration in support of the defendants' Motion for Joinder in ECF 1083.

3. On July 25, 2024, counsel for Co-Defendant Peter Gerace filed a Joint Motion for Disclosure. *See* ECF 1083. In its response, the government questioned whether co-defendant Bongiovanni has officially joined in the motion for disclosure because counsel for Mr. Bongiovanni had not filed anything on the docket. *See* ECF 1100.

4. Co-Defendant Bongiovanni hereby joins in the motion for disclosure and incorporates all arguments made in ECF 1083.

Dated: August 7, 2024  
Williamsville, New York

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